

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: Kenneth H. Clark, Jr.) Case Number 19-13850
) Chapter 13 Proceedings
 Debtor(s).) Judge Arthur I. Harris

**TRUSTEE’S OBJECTION TO MOTION TO
MODIFY PLAN PURSUANT TO CARES ACT**

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee (“Trustee”) herein, and hereby objects to the Motion to Modify Plan Pursuant to Cares Act filed with this Court on January 6, 2022 (hereinafter “Debtor’s Motion”). In support of this objection, the Trustee makes the following representations to the Court:

1. Part 3.4 of the Plan has been calculated incorrectly; therefore, the Trustee cannot determine treatment of this claim.
2. Debtor has failed to provide verification of loss of income as requested, such as yearend pay advice for 2021.
3. The Trustee reserves the right to amend and/or supplement her objection should additional information be provided.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtor’s Motion for the reasons cited.

Respectfully submitted,

/S/ Lauren A. Helbling

LAUREN A. HELBLING (#0038934)

Chapter 13 Trustee

200 Public Square, Suite 3860

Cleveland OH 44114-2321

Phone (216) 621-4268 Fax (216) 621-4806

ch13trustee@ch13cleve.com

CERTIFICATE OF SERVICE

I certify that on January 25, 2022, a true and correct copy of the Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

William J. Balena, Attorney, on behalf of Kenneth Harry Clark, Jr., Debtor(s)
at docket@ohbksource.com

/S/ Lauren A. Helbling

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